

Exhibit B



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Our File Number 19-1306127

VIA EMAIL AND U.S. MAIL

February 26, 2020

Scott Marcus
Gabriel Dermer
Patricia Ursea
Felix Labron
Office of the City Attorney
200 N. Main Street, 6th Floor
Los Angeles, California 90012

RE: *Garcia v. City of Los Angeles*; Case No. 2:19-cv-06182

Dear Counsel,

As you know, we filed a motion for a preliminary injunction this morning, asking the Court to enjoin the enforcement of LAMC 56.11(3)(i) and 56.11(10)(d). We had hoped, based on the Court's ruling on the City's motion to dismiss and my discussion with Mr. Dermer on Wednesday, the City would be willing to discuss a resolution of these issues without further court intervention. But as we reiterated on Friday, we could not wait much longer to protect our clients' rights—particularly given LA Sanitation and LAPD's continued enforcement of the Bulky Item Provision, which was confirmed by our clients on Monday and is documented in our motion.

As we have stated many times, we strongly agree that litigation is not the most effective way to address the homelessness crisis in this City, and we are under no illusion that litigation could ever solve this crisis. But the continued enforcement of a plainly unconstitutional ordinance is not the solution either. And as long as the City continues to rely on unconstitutional tactics, our clients are left with little recourse, other than to seek the court's assistance to end it. Put simply, the City's ongoing enforcement is causing real harm to unhoused people in our community. We could not wait any longer to seek court intervention than we already have, while the City considers its options.

Nonetheless, we filed a noticed motion. The hearing on our motion is scheduled for March 30, 2020, and we remain open to meeting with the City to discuss ways to avoid further litigation. If we are able to reach a resolution regarding the ongoing enforcement of the bulky item provision without the need for further court intervention, we are of course willing to take the motion off calendar.

Other Office Locations:

East Los Angeles Office, 5228 Whittier Blvd., Los Angeles, CA 90022; 213-640-3883
Long Beach Office, 601 Pacific Ave., Long Beach, CA 90802; 562-435-3501
Santa Monica Office, 1640 5th St., Suite 124, Santa Monica, CA 90401; 310-899-6200
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Letter to City of Los Angeles

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As Mr. Marcus noted after the hearing on February 10, 2020, you know where to reach us.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Myers". The signature is fluid and cursive, with the first letter "S" being large and prominent.

Shayla R. Myers
Legal Aid Foundation of Los Angeles

Catherine Sweetser
Schonbrun Seplow Harris and Hoffman

Benjamin Herbert
Kirkland & Ellis LLP